

ORIGINAL

eunleeind

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FILED
DISTRICT COURT OF GUAM
NOV - 9 2005
MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

vs.

EUN YOUNG LEE, aka
EUN YOUNG CHO,

Defendant.

CRIMINAL CASE NO.

05-00082

INDICTMENT

CRIMINAL CONSPIRACY

[18 U.S.C. § 371]

(Count I)

**BRIBERY CONCERNING PROGRAM
RECEIVING FEDERAL FUNDS**

[18 U.S.C. § 666(a)(1)(B)]

(Count II)

THE GRAND JURY CHARGES:

1. At all times relevant to this Indictment, the Guam Department of Revenue and Taxation (the Department) was a component unit and agency of the Government of Guam. The Department's responsibilities included the licensing, registration, and connected enforcement functions relating to the operation of motor vehicles on Guam. In particular, the Department was responsible for administering the licensing examination program for all drivers on Guam's highways. To this end, the Department created the Motor Vehicle Division and employed motor vehicle examiners to administer eye examinations, driving tests, and other tests necessary to ensure that the holder of a Guam driver's license was qualified to operate a motor vehicle safely.

1 2. At all times relevant to this indictment, the Guam Department of Revenue and
2 Taxation received federal assistance in excess of \$10,000 during a one-year period between
3 November 8, 2004, and November 8, 2005.

4 3. At all times relevant to this indictment, the Guam Department of Revenue and
5 Taxation had a Memorandum of Understanding and Agreement with the University of Guam,
6 wherein the University would proctor, score and tabulate written examinations taken by
7 applicants for a Guam driver's license. A passing score on the written examination was required
8 before the applicant could receive a Guam driver's license.

9 4. At all times relevant to this indictment, defendant EUN YOUNG LEE had contracted
10 with the University of Guam to act as a Korean translator for the Driver's License Written
11 Examination and other translation assignments related thereto. Her duties included truly and
12 accurately translating the examination from English into Korean for the benefit of Korean-
13 speaking applicants for Guam driver's licenses.

14 COUNT I - CONSPIRACY TO RECEIVE BRIBES

15 5. Paragraphs 1 through 4 are incorporated and realleged herein.

16 6. Beginning on or about November 9, 2000, the exact date being unknown to the Grand
17 Jury, and continuing through November 9, 2005, within the District of Guam and elsewhere, the
18 defendant herein, EUN YOUNG LEE, did willfully and knowingly combine, conspire,
19 confederate and agree with others, both known and unknown to the Grand Jury, to commit
20 offenses against the United States, to-wit: Receipt of a Bribe by an Agent of an Organization
21 Receiving Federal Funds in violation of Title 18, United States Code, § 666(a)(1)(B), and to aid,
22 abet, counsel, command, induce and procure the conspiracy charged in this count and willfully
23 cause others to perform acts and make statements in furtherance of the conspiracy, in violation of
24 Title 18, United States Code, §§ 2 and 371.

25 OBJECT OF THE CONSPIRACY

26 7. It was an object of the conspiracy for EUN YOUNG LEE and employees of the Motor
27 Vehicles Division to receive financial gain by issuing Guam driver's licenses to persons who had
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1 not passed the examinations required for such licenses.

2 OVERT ACTS

3 In furtherance of the conspiracy and in order to effect the objects thereof, the defendant
4 EUN YOUNG LEE and her co-conspirators performed the following overt acts, among others, in
5 the District of Guam and elsewhere:

6 8. On March 10, 2005, EUN YOUNG LEE received \$1,000 to secure the issuance of two
7 Guam driver's licenses.

8 9. EUN YOUNG LEE and co-conspirators working in the Motor Vehicle Division issued
9 two Guam driver's licenses in the names of two individuals who had not taken or passed the
10 examinations necessary to secure such licenses legally.

11 ALL IN VIOLATION OF Title 18, United States Code, §§ 2 and 371.

12
13 COUNT II - BRIBERY CONCERNING PROGRAM
14 RECEIVING FEDERAL FUNDS

15 10. Paragraphs 1 through 4 are incorporated and realleged herein.

16 11. On or about , 2005, in the District of Guam, the defendant herein, EUN YOUNG
17 LEE, being an agent of a local government agency, to-wit: the Guam Department of Revenue and
18 Taxation, did knowingly and corruptly solicit, demand, accept and agree to accept something of
19 value from Michael Ho, intending to be influenced and rewarded in connection with a business
20 and transaction, or series of transactions of the Guam Department of Revenue and Taxation
21 involving something of value of \$5,000 or more, to-wit: the issuance of two Guam driver's

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1 licenses to persons who had not passed the examinations required to hold such licenses lawfully,
2 ALL IN VIOLATION of Title 18, United States Code, §§ 2 and 666(a)(1)(B).

3 Dated this 9th day of November, 2005.

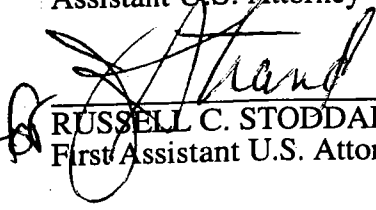
4 A TRUE BILL.

5 
6 
7 Foreperson

8 LEONARDO M. RAPADAS
9 United States Attorney
10 Districts of Guam and NMI

11 By: 

12 KARON V. JOHNSON
13 Assistant U.S. Attorney

14 
15 RUSSELL C. STODDARD
16 First Assistant U.S. Attorney

Place of Offense:

City Hagåtña

Related Case Information:

05-00082

Country/Parish _____

Superseding Indictment _____ Docket Number _____

Same Defendant _____ New Defendant X

Search Warrant Case Number _____

R 20/ R 40 from District of _____

Defendant Information:

Juvenile: Yes _____ No X Matter to be sealed: _____ Yes X NoDefendant Name EUN YOUNG LEEAlias Name EUN YOUNG CHO

Address _____

Birthdate _____ SS# _____ Sex F Race A Nationality Korean

U.S. Attorney Information:

AUSA Karon V. Johnson

Interpreter: _____ No _____ Yes _____ List language and/or dialect: _____

Location Status:

Arrest Date _____

☐ Already in Federal Custody as of _____ in _____☐ Already in State Custody☐ On Pretrial Release

U.S.C. Citations

Total # of Counts: 2 _____ Petty _____ Misdemeanor X Felony

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
Set 1	<u>18 USC 371</u>	<u>Criminal Conspiracy</u>	<u>1</u>
Set 2	<u>18 USC 666(a)(1)(B)</u>	<u>Bribery Concerning Program Receiving Federal Funds</u>	<u>2</u>
Set 3	_____	_____	_____
Set 4	_____	_____	_____

(May be continued on reverse)

Date: 11/9/05 Signature of AUSA: Karon V Johnson

RECEIVED
 NOV - 9 2005
 DISTRICT COURT OF GUAM
 HAGATNA, GUAM